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ATTORNEY FOR DEFENDANT
Shalom Ifrah

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO. 2:22-CR-0046-TLN
)	
Plaintiffs,)	STIPULATION TO ALLOW
)	DEFENDANT IFRAH' TO TRAVEL
)	TO AND FROM NEW YORK AND TO
)	AND FROM BIG BEAR, CALIFORNIA
vs.)	DECLARATION OF DAVID E.
)	KENNER; ATTACHMENTS A, B, and C
SHALOM, IFRAH ET AL.,)	
)	
)	<u>[PROPOSED] ORDER LODGED</u>
)	<u>HEREWITH</u>
Defendants.)	
)	
)	
)	

IT IS HEREBY STIPULATED by and between Phillip Talbert, United States Attorney, through Roger Yang, Assistant United States Attorney, attorney for Plaintiff, and David E. Kenner, attorney for defendant Shalom Ifrah, with the concurrence of the Pretrial Services Agency, that the defendant may travel to and from Brooklyn, New York, on January 12, 2023 and returning on January 16, 2023. And defendant may travel to Big Bear California, on December 30, 2022 and returning on January 2, 2023.


This request is supplemented by the declaration of undersigned counsel, Exhibits A, B, and C, all the files and records in this case.

///

/s/

/s/

IT IS SO ORDERED.


HON. JUDGE JEREMY D. PETERSON
U.S. Magistrate Judge

DECLARATION OF DAVID KENNER; ATTACHMENTS A, B, AND C

DECLARATION OF DAVID E. KENNER

David E. Kenner declares:

1. I am the attorney of record for the herein defendant, Shalom Ifrah.
2. Attached as Exhibit A is a true and correct copy of a receipt showing that Ifrah has purchased a flight to Brooklyn, New York departing January 12, 2023 from LAX going to JFK, and returning on January 15, 2023 (A round trip to and from New York).
3. Attached as Exhibit B is a true and correct copy of his temporary residence at an AirBNB while traveling located at: 984 Lincoln Place, Brooklyn New York. Ifrah will be living here temporarily during the trip from January 12, 2023 until January 15, 2023.
4. The reason for Ifrah' trip to Brooklyn, New York is a Jewish Chabad event.
5. Attached as Exhibit C is a true and correct copy of his temporary residence at an AirBNB while traveling located at 611 Crestwood Drive Big Bear Lake, California, from the date December 30, 2022 until January 2, 2023.
6. The reason for Ifrah's trip to Big Bear, California is a New Year's trip with his family.
7. Ifrah will be driving several hours to Big Bear, California to complete this trip.
8. I have met and conferred with: (a) Mr. Ifrah' pretrial services officer, Deputy Zepeda, who has indicated that I can represent to the Court that, she has no objection to this request. Also, AUSA Roger Yang has no objection to the court granting this request. Further, they do not oppose Mr. Ifrah traveling without the location monitoring equipment. Mr. Ifrah would be authorized to have the location monitoring condition/
curfew suspended during his travel status during both trips.

1 I declare under penalty of perjury, according to the laws of the United States of
2 America, that the foregoing is true and correct this 21st day of December, 2022, at
3 Encino, California.

4 _____/s/_____
5 David E. Kenner
6 Attorney at Law
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EXHIBIT A

13:21



[Inbox](#) JetBlue booking confirma... [A](#) [V](#)

Traveler Details

SHALOM IFRAH

Frequent Flier: [Add TrueBlue #](#)

Ticket number: 2792110760874

LAX-JFK:

Fare: Blue

Seat: [27D](#)

JFK- LAX:

Fare: Blue

Seat: [23F](#)

Bag Allowance (per traveler)

Thu, Jan 12	Personal Item	Carry-on	1st Bag	2nd Bag
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LAX- JFK	Free	Free	From \$30*	From \$40**
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Sun, Jan 15	Personal Item	Carry-on	1st Bag	2nd Bag
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13:20



[Inbox](#) JetBlue booking confirma... [A](#) [V](#)

Flights

LAX

Los Angeles,
CA

Terminal: 5



JFK

New York, NY

Date Thu, Jan 12

Departs 8:55am

Arrives 5:28pm

Flight 324

jetBlue

JFK

New York, NY

Terminal: 5



LAX

Los Angeles, CA

Date Sun, Jan 15

Departs 8:00pm

Arrives 11:32pm

Flight 1723

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EXHIBIT B

15:18
◀ Messages



Trips

Upcoming reservations



Brooklyn

Entire home hosted by David

Jan 12-15 2023 984 Lincoln Place
Brooklyn, New York
United States

Explore things to do near Brooklyn



Just for you
18 experiences



Travel
6



Food and drink
112 experiences



Activities
2



Explore

Wishlists

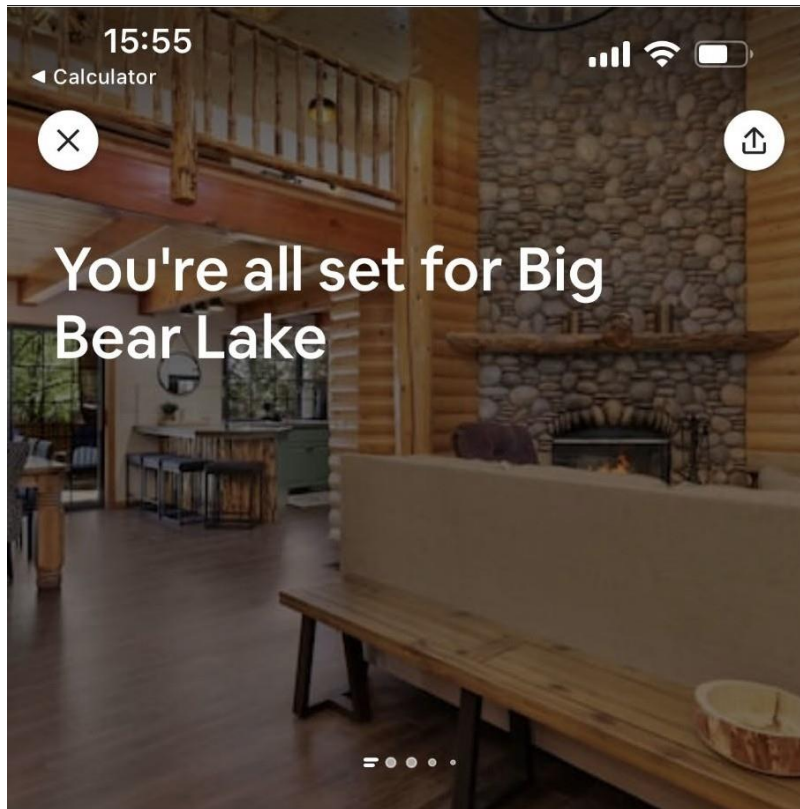
Trips

Inbox



Profile

EXHIBIT C



Check-in

Fri, Dec 30

4:00 PM

Checkout

Mon, Jan 2

10:00 AM

Getting there

Address: 611 Crestwood Drive

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Things to know

Instructions and house rules

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Message your host

Big Bear Vacations

uil

Your place

Dreams of Summit by Big Bear Vacations | Luxur...



15:55
Calculator



Trips

Upcoming reservations



Big Bear Lake

Entire home hosted by Big Bear Vacations

Dec 30- Jan 2
2022/2023

611 Crestwood Drive
Big Bear Lake, California
United States

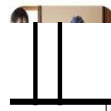
Explore things to do near Big Bear Lake



Just for you
18 experiences



Nature
18 experiences



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Explore

Wishlists

Trips

Inbox

Profile